

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Kasaras Kemp

Case No.

Case: 2:23-mj-30358

Assigned To : Unassigned

Assign. Date : 8/30/2023

Description: COMP USA V. KEMP  
(KB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 28, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

Danielle Stefanovski, Special Agent, ATF  
Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 30, 2023

City and state: Detroit, MI



Judge's signature

Hon. R. Steven Whalen, United States Magistrate Judge  
Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**AFFIDAVIT IN SUPPORT OF**  
**A CRIMINAL COMPLAINT**

I, Special Agent Danielle Stefanovski, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.

2. I have been an ATF Special Agent since March of 2018, and I have had extensive law enforcement training, including the Criminal Investigator Training Program at the Federal Law Enforcement Training Center, the United States Secret Service (USSS) Special Agent Training Program in Beltsville, Maryland, and ATF Special Agent Basic Training in Glynco, Georgia. I also received a Bachelor of Business Administration from the University of Michigan.

3. As an ATF Special Agent, I have participated in numerous criminal investigations, including investigations involving firearms, firearm traffickers, armed drug tracking, and criminal street gangs. I am familiar with, and have experience using, a variety of investigative techniques and resources, including

physical and electronic surveillance, undercover investigation work, and various types of informants and cooperating sources.

4. The statements contained in this affidavit are based, in part, on my review of written police reports by Detroit Police Department (DPD) officers. This affidavit also includes information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter, my own investigation, and the review of documents.

5. ATF is currently conducting a criminal investigation concerning Kasaras KEMP (B/M; DOB: XX/XX/1990) for violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

### **PROBABLE CAUSE**

6. I reviewed a computerized criminal history and Michigan Third Circuit Court records for KEMP, which revealed the following felony arrests and convictions.

- a. On August 2, 2007, KEMP was charged with felony unlawful driving away of an automobile and receiving and concealing stolen property—motor vehicle in Wayne County Third Circuit Court. On August 2, 2007, KEMP pleaded guilty to one count of felony unlawful driving away of an automobile. KEMP was initially sentenced to two years' probation pursuant to the Holmes Youthful

Trainee Act (HYTA). However, KEMP violated probation and his HYTA status was revoked on April 29, 2010.

- b. On September 1, 2008, KEMP was charged with carrying a concealed weapon in Wayne County Third Circuit Court. On January 27, 2009, KEMP pleaded guilty as charged. KEMP was initially sentenced to two years' probation pursuant to the Holmes Youthful Trainee Act (HYTA). However, KEMP violated probation and his HYTA status was revoked on April 29, 2010.
- c. On December 16, 2009, KEMP was charged with assault with intent to murder, assault with intent to do great bodily harm less than murder, felonious assault, carrying a concealed weapon, and felony firearm in Wayne County Third Circuit Court. On April 29, 2010, KEMP pleaded guilty to assault with intent to do great bodily harm less than murder and felony firearm. On May 12, 2010, KEMP was sentenced to five to ten years' incarceration in the Michigan Department of Corrections for the assault with intent to do great bodily harm and two years' incarceration for the felony firearm, to run consecutively.
- d. On May 31, 2017, KEMP was charged with carrying a concealed weapon, felon in possession of a firearm, fleeing and eluding—

third degree, and felony firearm in Wayne County Third Circuit Court. On October 6, 2017, KEMP pleaded guilty to fleeing and eluding—third degree. On October 24, 2017, KEMP was sentenced to two to five years' incarceration in the Michigan Department of Corrections. KEMP is still on parole for this offense.

- e. On September 26, 2021, KEMP was charged with assault with intent to murder, assault with intent to do great bodily harm less than murder, discharge of a weapon from a vehicle causing injury, and felony firearm in Wayne County Third Circuit Court. KEMP was found not guilty by jury on December 12, 2022.
- f. Because KEMP has multiple felony convictions, has served a total of more than nine years' incarceration, is currently on parole with the Michigan Department of Corrections, and was previously charged with the offense felon in possession of a firearm in two separate cases, there is probable cause to believe that KEMP is aware of his status as a convicted felon.

7. On August 28, 2023, at approximately 7:02 p.m., Detroit Police officers responded to the area of XXXX1 Mitchell Street in Detroit on a call for a person with a weapon. The 911 caller reported that a black male with braids,

wearing all black and red shoes was playing with a gun while standing in front of a residence on Mitchell Street.

8. Responding officers encountered three males standing outside the residence on Mitchell Street, including KEMP, who was wearing all black with red shoes. The officers approached the trio and asked KEMP if he had a firearm. KEMP gave an unintelligible verbal response and then ran from the officers. The officers chased after him. KEMP ran into the backyard of a house across the street and was apprehended by the officers. The officers recovered a loaded Glock 21 Gen4, .45 caliber handgun from KEMP'S pant leg. The officers placed KEMP under arrest for carrying a concealed weapon.

9. On August 29, 2023, I contacted ATF Interstate Nexus Expert, Special Agent Kara Klupacs and provided a verbal description of the Glock 21 Gen4, .45 caliber handgun recovered by Detroit Police officers on August 28, 2023. SA Klupacs advised the firearm was manufactured outside of the state of Michigan, and therefore has traveled in and affected interstate commerce.

### **CONCLUSION**

10. Based upon the aforementioned facts stated herein, there is probable cause to believe Kasaras KEMP (B/M; DOB: XX/XX/1990), a convicted felon aware of his felony convictions, did knowingly and intentionally possess a Glock 21 Gen4, .45 caliber handgun, said firearm having affected interstate commerce, in

violation of 18 U.S.C. 922(g)(1) (Felon in Possession of a Firearm). Said violation occurring on or about August 28, 2023 in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,

  
Danielle Stefanovski  
Special Agent, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means.

  
Hon. R. Steven Whalen  
United States Magistrate Judge

Dated: August 30, 2023